



FILED electronically via ECFS
March 15, 2021

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: WC Docket No. 21-450, FNPRM for Affordable Connectivity Program Implementation

Dear Ms. Dortch,

On behalf of [Stewards of Affordable Housing for the Future \(SAHF\)](#), we would like to thank the Federal Communications Commission (FCC) for the opportunity to comment on its *Pilot Program Focused on Eligible Households Participating in Federal Public Housing Assistance (FPHA) Programs* as part of the Affordability Connectivity Program (ACP). SAHF appreciates the FCC's recognition of the importance of affordable connectivity for federally assisted households. However, as the FCC states in its notice, only a small number of federally assisted households enrolled in the Emergency Broadband Benefit Program (EBB) even though most of these households were eligible. Thus, it is critical that the FCC engage in a robust marketing and outreach campaign, including working with the Department of Housing and Urban Development (HUD) to increase awareness and enrollment in the ACP among federally assisted households. SAHF believes a new approach is needed to ease enrollment barriers and ensure federally assisted households can successfully participate in the ACP and help bridge the digital divide in affordable housing communities across the country.

SAHF draws on the experience of our members — twelve exemplary multi-state nonprofits who collectively own, operate, and manage more than 149,000 affordable rental homes for persons of limited economic means in 2,000 properties across the country— to inform our work on broadband access. The digital divide has a profound impact on affordable housing residents, [who are nearly twice as likely to lack high-speed internet connections as the general population](#). The COVID-19 pandemic has only exacerbated this gap, particularly in communities of color, and made digital access an essential lifeline to sustain health and economic well-being. Though our members have engaged in some scalable solutions to bridge the digital divide for residents at their properties, the costs associated with broadband subscriptions present the greatest challenge in expanding digital accessibility and adoption rates in multifamily affordable rental housing.¹

14. Are there other obstacles to ACP enrollment for FPHA beneficiaries that should be addressed?

Automatic Eligibility for Multifamily Assisted Housing: The main barrier to enrollment in the FCC's low-cost programs, including Lifeline and the ACP, is the lack of automatic eligibility for residents living in multifamily

¹ In February 2021, SAHF released our [digital access resource](#), outlining barriers and opportunities to bridging the digital divide in affordable housing communities.



assisted housing. The ACP and Lifeline programs provide automatic eligibility for residents of Federal Public Housing. While guidance around ACP and its predecessor programs contemplate that project based rental assistance is included in the definition of federal public housing, the lack of clear guidance around the definition of FPHA and the exclusion of residents/properties benefitting from project-based rental assistance from USAC's National Verifier has created unnecessary hurdles for the roughly one million households benefitting from project-based rental assistance. In our [comment letter](#) to the FCC (*WC Docket No. 21-450, ACP Public Notice*) in December 2021, SAHF recommended that FCC direct the Universal Service Administrative Company (USAC) to collaborate with HUD and enter into a data sharing agreement to facilitate automatic verification of eligibility for residents of all federally-assisted housing (SAHF also recommended this during EBB rulemaking). Unfortunately, the FCC did not include this recommendation in its final ACP rules. SAHF learned from members that many residents declined to enroll into EBB due to the cumbersome enrollment process and lack of automatic eligibility. SAHF members are concerned that without automatic eligibility for the ACP, residents will encounter the same obstacles that contribute to inequitable internet access among residents of affordable housing.

To ease enrollment barriers for ACP, SAHF again urges the FCC to work with the Office of Multifamily Housing at HUD to clarify automatic eligibility for participants in federally assisted multifamily housing properties, such as those assisted under project-based rental assistance (Section 8 and Section 202 PRAC). This could be verified through connections from the National Verifier to HUD databases such as the Tenant Rental Assistance Certification System (TRACS).

To further streamline enrollment, FCC should collaborate with HUD to establish building-wide eligibility for residents of a building where all or a substantial number of the homes are assisted under a rental assistance contract. This would reduce the burden on applicants and on those assisting them. There is precedent for using the presence of a project-based rental assistance contract to establish eligibility for benefits under another federal program. HUD has collaborated with the Department of Energy to establish eligibility for the Weatherization Assistance Program by relying on the presence of project-based rental assistance. This experience could inform a property/address-based approach for ACP eligibility verification.

Bulk billing arrangements:

SAHF urges the FCC to adopt measures to make it easier for owners of federally assisted properties to enter bulk billing arrangements with participating internet service providers (ISP). SAHF members are deeply committed to ensuring all residents have access to internet service and many provide it at no cost to residents. However, current ACP rules forbid SAHF members, as nonprofit affordable housing owners, from claiming ACP support to connect residents through bulk billing arrangements. Facilitating these arrangements would streamline the ACP enrollment and billing processes for all parties involved, including housing owners, residents, and ISPs. The arrangements could also provide owners the opportunity to pair ACP enrollment with building-wide connectivity solutions that are feasible and less expensive alternatives to retrofitting existing buildings.

16. The Commission also seeks comment on whether and how it can partner with third parties, including non-profit organizations, to help identify, develop, and carry out these marketing and outreach efforts. Should the Commission use Affordable Connectivity Program funding designated for outreach for these efforts? Should the Commission encourage partner agencies to establish, as part of this pilot, assistance locations on site where eligible household members can complete and submit



applications for the Affordable Connectivity Program? What are the benefits of such arrangements? This effort could impose some additional burdens on the staff and resources of partner agencies; how can the Commission reduce such burdens?

SAHF urges the FCC to implement a robust marketing and outreach campaign with nonprofit affordable housing owners, accompanied with designated funding to ensure households can successfully participate in the ACP. The complex eligibility process that involves both USAC's and ISPs' web interfaces stymied many residents' ability to successfully enroll. Onsite resident service coordinators have trusted relationships with residents of affordable rental housing, understand their participation in Federal Public Housing Programs and have access to local partners and resources to support digital inclusion. They also played a critical role in facilitating residents' enrollment into EBB, however due to capacity constraints (they may support 100 or more households in connecting with a range of needs) and competing priorities, service coordinators were not always able to devote the resources needed to reach or assist all residents. Thus, a pilot program for federally assisted households must include funding for owners to hire onsite staff to educate residents on the ACP and assist them through the enrollment process. Federally assisted properties should also have a point of contact at the FCC that had access to a database of qualified properties (this could be facilitated through USAC-HUD data sharing) to address eligibility or processing questions throughout the duration of the ACP.

Even if households have an affordable internet plan, the cost of fully-capable devices (including maintenance support) and capacity constraints in providing digital adoption support to residents are challenges for multifamily housing providers and prevent residents from fully utilizing their internet connections. The FCC-HUD pilot proposal should include support for sustainable adoption solutions, such as forming partnerships on digital navigator training programs, bolstering resident service capacity, strengthening digital literacy efforts, and incentivizing ISPs to provide free/reduced-cost fully-capable devices to residents.

19. The Commission seeks comment on how to measure the success of this pilot in increasing awareness of and enrollment in the Affordable Connectivity Program by participants in qualifying Federal Public Housing Assistance Programs.

If USAC and HUD engaged in data sharing and required ISPs to provide the number of enrolled households at each property during the pilot, the FCC could compare this data to the number of enrolled households before the pilot's launch. Onsite ACP support staff could also play a role in data collection based on the number of households they help connect to the program. This data would help inform the FCC and stakeholders of the pilot's success in increasing enrollment among federally assisted households.

SAHF and its members appreciate FCC's public engagement on its proposed pilot program for federally assisted households. Given the disparities in access between affordable housing residents and market-rate units-- 20-25% of the digital divide is concentrated in low-income apartment buildings,² it is critical that the FCC, together with HUD, develop a comprehensive approach to increase ACP enrollment among federally assisted households. We hope that our comments, based on feedback from SAHF members' experiences in

² See EducationSuperHighway's comments to [FCC WC Docket No. 21-450](#), Attachment at 9 (filed Dec. 8, 2021)



EBB, will help inform guidance on the pilot proposal. SAHF and its members stand ready to work with the FCC to make the pilot a success and ensure equitable access for all affordable housing residents.

Please feel free to contact Lucas Asher, SAHF's Policy Associate for Housing Stability and Resident Well-Being (lasher@sahfnet.org) with any questions about our comments above.

Sincerely,

Andrea Ponsor
President & CEO

COLLABORATE. INNOVATE. ACCELERATE.

Stewards of Affordable Housing for the Future

750 9TH Street NW Suite 650, Washington, D.C. 20001-4793 • P (202)737-5970 • www.sahfnet.com